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June 8, 2020

**Via Electronic Filing**

Honorable Joel Schneider  
United States Magistrate Judge  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza-4<sup>th</sup> & Cooper Sts.  
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al,  
Civil Action No.: 17-cv-02864 (NLH-JS)

Dear Judge Schneider:

I represent Defendants from the Department of Corrections (DOC) in the above-entitled action. Because additional time is needed to complete discovery, I respectfully request an extension of the discovery deadline to August 31, 2020. On February 20, 2020, the Court issued a scheduling order, which made factual discovery due by May 1, 2020. I apologize to the Court for my oversight in missing the deadline before requesting an extension. However, due to exigent circumstances related to COVID-19, discovery in this matter has been delayed.

Plaintiff is an inmate who had been incarcerated at South Woods State Prison; however, mail sent to him at that location was returned as undeliverable. Recently however, it was confirmed that he has returned to South Woods.

On March 4, 2020, Defendants resent interrogatories and request for documents to Plaintiff. To date, he has not responded. Defendants need the benefit of Plaintiff's responses to interrogatories before conducting his deposition.



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To complete discovery, I need to obtain additional medical records from DOC related to Plaintiff's ADA claims. Because Plaintiff's ADA claims relate specifically to certain events at the prison, I need to conduct additional interviews of custody and medical staff. I also need to obtain Plaintiff's complete classification file, which needs to be reviewed, bates-labeled and produced to Plaintiff and counsel for the medical Defendants. I also anticipate discovery demands from counsel for the medical Defendants, in response to Plaintiff's medical claims.

Due to Plaintiff's incarceration, I was not able to obtain his response to this request. Should the Court grant this request, factual discovery would be extended to August 31, 2020. I thank the Court for its consideration.

Respectfully submitted,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: s/ Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General

cc: **Via Regular Mail**

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